

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JACKIE FISHER

Plaintiff,

vs.

UNIVERSITY OF TEXAS
MEDICAL BRANCH and
DAVID WATSON

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:08-CV-01273

Jury Demanded

PRIVILEGE LOG

1. Peer Review Committees Report to BNE (5/10/05) 2 pages.
2. Subject Inmate's Refusal of Treatment or Services Form (8/16/04) 1 page
3. Subject Inmate's Nursing Assessment Protocol for Psychiatric Symptoms (8/19/04) 2 pages
4. Subject Inmate's Mental Health Disciplinary Case Review (8/19/04) 3 pages
5. Subject Inmate's Second Refusal of Treatment or Services (8/19/04) 1 page
6. Subject Inmate's Clinical Note (8/20/04) 1 page
7. Subject Inmate's Triage Interview (8/20/04) 3 pages
8. Subject Inmates Suicide Risk Assessment (8/20/04) 3 pages
9. Clinic note about subject inmate (8/20/05) 1 page
10. Outpatient Mental Health Follow-Up for Subject Inmate (8/23/04) 3 pages
11. Mental Health Disciplinary Case Review for Subject Inmate (8/24/04) 1 page
12. Case Management Notes on Subject Inmate (8/24/04) 1 page
13. Triage interview on Subject Inmate (8/25/04) 2 pages



14. Outpatient Psychiatric Follow-up for Subject Inmate (8/25/04) 2 pages
15. Clinic notes - mid level provider for subject inmate (8/27/04) 3 pages
16. Emergency Record (8/27/04) 2 pages
17. Joint Mortality Review Committee of Texas Dept. of Criminal Justice Request (1/13/05)
1 page
18. UTMB Notice of Nursing Peer Review (3/21/05) 5 pages

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

KENT C. SULLIVAN
First Assistant Attorney General

DAVID S. MORALES
Deputy Attorney General for Civil Litigation

ROBERT B. O'KEEFE
Chief, General Litigation Division

SAM LIVELY
Assistant Attorney General
Texas Bar No. 12435300
General Litigation Division
P. O. Box 12548, Capitol Station
Austin, Texas 78711
Phone No. (512) 463-2120
Fax No. (512) 320-0667

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

The undersigned has, in good faith, conferred with opposing counsel, providing her with appropriate citations and a draft of this motion and have not heard back from her by the time of filing of this motion.

SAM LIVELY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and forgoing document has been sent via certified mail, return receipt requested, on March ____, 2008, to the following individual:

Jo Miller
505 North Main
Carriage House
Conroe, Texas 77301

SAM LIVELY
Assistant Attorney General